EXHIBIT 19

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN

AHMED ELZEIN,

Plaintiff,

-vs-

Case No. 22-CV-12352

ASCENSION GENESYS HOSPITAL,
Defendant.

DEPONENT: TAMMY GAUTHIER

DATE: Thursday, October 12, 2023

TIME: 9:49 a.m.

LOCATION: VIA ZOOM VIDEOCONFERENCE

REPORTER: Karen Fortna, CRR/RMR/RPR/CSR-5067

JOB NO: 26455

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1 of 2020?

- 2 A. Yes, I reported to the call with my officers.
- 3 Q. Did you receive the call from Dr. Elzein?
- 4 A. No.
- 5 Q. Do you know who received the call?
- 6 A. I do not recall.
- 7 Q. Do you recall how you first heard about this
- 8 report?
- 9 A. Our dispatch.
- 10 Q. So it was over a radio call?
- 11 A. Correct.
- 12 Q. Do all of your guards carry some sort of radio
- 13 system, a walkie-talkie, something along those
- 14 lines? Is that right?
- 15 A. Yes.
- 16 Q. And you also keep one on your person when you're at
- 17 work?
- 18 A. Yes.
- 19 Q. What do you recall about the radio call you
- 20 received regarding this report from Dr. Elzein?
- 21 A. The call that I recall coming in as resident
- 22 lounge -- a resident claiming that somebody had
- 23 placed a bomb in a locker.
- 24 Q. Was it a male or female that was sending out that
- 25 radio call?

- 1 to this call; is that correct?
- 2 A. Correct.
- 3 Q. Do you recall what time of day it was?
- 4 A. I recall first shift.
- 5 Q. And what are the hours for first shift?
- 6 A. They are from 6:00 to 2:30.
- 7 Q. I guess let me make that more clear. I want to
- 8 make sure we're clear. We're talking in
- 9 November 2020. Is that what the first shift was as
- 10 well?
- 11 A. Oh, yes. Sorry.
 - MS. LEBEAU: I'm sorry, you said six to
- 13 six?

12

19

- 14 THE WITNESS: 6:00 a.m. to 2:30 p.m.
- 15 BY MR. STEMPIEN:
- 16 Q. And do you recall the date?
- 17 A. I don't.
- 18 Q. When you arrived at the lounge -- let me back up.
 - Did you go to the lounge with somebody
- 20 else or did you go alone and meet the other guys
- 21 there?
- 22 A. I don't recall.
- 23 Q. Do you recall if you were the first person to
- 24 arrive?
- 25 A. I was not.

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- 1 A. I don't recall.
- 2 Q. In November of 2020, were there employees at
- 3 Teachout Security whose job function was just to be
- 4 in dispatch or did it between -- what I'm getting
- 5 at, did the same guards who rotated in the
- 6 dispatch have to do stints in dispatch or were
- 7 there people whose only job was just to do the
- 8 dispatch work?
- 9 A. They rotate.
- 10 Q. The person who was putting this out over the radio,
- were they reporting it directly to you or was this
- 12 a general announcement they made that you heard?
- 13 A. They were reporting to the on-shift supervisor
- 14 requesting officers to report.
- 15 Q. And you heard the call; is that correct?
- 16 A. Correct.
- 17 Q. And you responded to the resident lounge?
- 18 A. Correct.
- 19 Q. Who else responded?
- 20 A. Michael Bossert. And I don't recall who else was
- 21 on that call.
- 22 Q. How many guards besides yourself? So it was you
- 23 and Michael Bossert. How many more were there?
- 24 A. Two.
- 25 Q. So a total of four security people came to respond

- 1 Q. Did you talk to Dr. Elzein that day?
- 2 A. Yes.
- 3 Q. As far as you know, when you arrived, had he
- 4 already spoken to any of the other security guards?
- 5 A. Not that I'm aware of.
- 6 Q. Did you talk to Dr. Elzein before physically
- 7 looking at any of the lockers or anything like
- 8 that? Did you first talk to him?
- 9 A. Yes.
- 10 Q. Tell me about that conversation. Tell me what he
- 11 said, what you said.
- 12 A. We asked him what was going on, what was the issue,
- the normal questions we would ask. He stated that
- 14 somebody quickly came in, placed something in a
- 15 locker and left and he didn't want to be involved16 in anything. We asked him which locker, he said,
- 17 "Somewhere down there." So we searched several
- 18 lockers. We searched the resident lounge
- 19 completely. He just kept saying he didn't want to
- 20 be involved in anything.
- 21 And we searched and the only thing that
- 22 was found was someone's groceries, a brown paper

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- 23 sack that had been set inside a locker with no
- 24 lock, and there had been food in the bag.
- 25 Q. That was the only item you found in any of the